

November 10, 2005

Federal Communications Commission
Washington, DC 20554

Re: CG Docket No. 05-231

Commissioners,

CaptionMax agrees to and enthusiastically supports every point made in the AMIC (Accessible Media Industry Coalition) NPRM response. The member representatives who worked together to craft the AMIC comments collectively represent hundreds of years of experience in the relatively young captioning industry. They work in captioning because they believe in the value of quality accessibility and in the right of every individual to have the same access to news, education, information, and entertainment. The AMIC document represents this commitment to quality and an unwavering support of the value of high, industry-wide standards.

CaptionMax is proud to have contributed to AMIC's comments to the FCC's NPRM, and wishes to strongly encourage the FCC to set the bar of quality as high as possible and to implement a workable means of monitoring and enforcement. The FCC's role of setting standards and enforcing them cannot be underemphasized, because captioning is an industry in which the consumer has little to no control over the product's quality.

For this reason, CaptionMax salutes TDI and its partners for their role in encouraging quality – and in working with the FCC to develop a workable means of helping consumers identify and troubleshoot problems.

Finally, in addition, to the AMIC NPRM, CaptionMax encourages the FCC to revisit the Television Decoder Circuitry Act of 1990 to ensure that the new digital display devices follow a consistent standard that ensures simple, turnkey accessibility for the end-user. As television access becomes more

fluid (monitors and cable boxes without tuners, for example), no end-user should ever end up purchasing television equipment without having simple, easily accessible captions.

Sincerely,

A handwritten signature in black ink, appearing to read "Max Duckler", with a long horizontal flourish extending to the right.

Max Duckler
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About CaptionMax: CaptionMax, established in 1993, is a privately held corporation specializing in accessible media services, primarily captioning, subtitling, and description of live and pre-recorded video.